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*Counsel for Debtor and Debtor in  
Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Empire One Telecommunications, Inc.	:	10-10987 (ALG)
aka EOT,	:	
	:	
Debtor.	:	EIN: 54-1963388
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**PLAN SUPPLEMENT OF THE DEBTOR, EMPIRE ONE  
TELECOMMUNICATIONS, INC. IN CONNECTION WITH ITS  
SECOND AMENDED PLAN OF LIQUIDATION [D.I. 132]**

## **IDENTIFICATION OF CHIEF LIQUIDATION OFFICER**

Susan King, CPA  
Susan King & Company  
78 Main Street  
Madison, NJ 07940

Ms. King currently serves as the Debtor's accountant. As Chief Liquidation Officer, Ms. King will receive compensation in the amount of \$5,000 per month to provide all services as Chief Liquidation Officer, including accounting services, under the Second Amended Plan of Liquidation.

## CAUSES OF ACTION

Company Name	Claim
Alsophila International HK Limited	\$71,000.00
AMEX	\$39,460.69
CNA Insurance	\$7,238.99
Cogent Communications	\$16,441.12
IBASIS Inc.	\$17,000.00
Massive Telecom	\$30,000.00
Montauk Credit Union	\$10,000.00
Oxford Health	\$56,073.55
Pannaway Technologies Inc.	\$18,640.71
RCN	\$60,562.00
Tata Communications	\$179,000.00
Telecom Italia	\$75,664.05
Waymobile S.L.	\$8,500.00
T-Mobile USA, Inc. <sup>1</sup>	\$1,495,820.80
All other transferees of preferential payments, as described in detail in the Debtor's Statement of Financial Affairs, which is incorporated herein by reference in its entirety.	See D.I. 15

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<sup>1</sup> The adversary proceeding styled *Empire One Telecommunications, Inc. v. T-Mobile USA*, is pending at Adversary No. 10-04234, and seeks to recover for the benefit of the Debtor's estate approximately \$1,495,820.80 for the Defendant's failure to pay for services provided by the Debtor. The remaining causes of action listed above are avoidance actions under the Bankruptcy Code that have not yet been commenced.

## POST CONFIRMATION RESERVE

Expense	Post-Confirmation Month 1	Post-confirmation Month 2	Post-Confirmation Month 3	Post-Confirmation Month 4	
<b>Professional Fees</b>					
BFCA	\$15,000	\$15,000	\$10,000	\$10,000	
Goldberg Rimberg	\$30,000	\$15,000	\$10,000	\$10,000	
King	\$5,000	\$5,000	\$5,000	\$5,000	
<b>Escrow for Estimated Administrative Claim of Universal Service Administrative Company<sup>2</sup></b>	\$50,000				
<b>TOTAL</b>	\$100,000	\$35,000	\$25,000	\$25,000	\$185,000

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<sup>2</sup> The Debtor believes that after an annual reconciliation, no monies will be owed to U.S.A.C. for an administrative claim and the fund reserved will be made for available for Post-Confirmation Expenses or distribution to the Debtor's other creditors in accordance with the terms of the Plan.